

Honorable _____

**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

ACME FOOD SALES, INC.,

Plaintiff,

v.

STARR SURPLUS LINES INSURANCE
COMPANY,

Defendant.

Cause No.: _____

(KING COUNTY SUPERIOR COURT
CAUSE NO. 13-2-24404-7 SEA)

**DECLARATION OF PETER J. MINTZER
IN SUPPORT OF DEFENDANT'S
NOTICE OF REMOVAL TO FEDERAL
COURT**

I, Peter J. Mintzer, declare as follows:

1. I am an attorney licensed to practice law in the State of Washington. I have been an active member of the Washington State Bar in good standing since November, 1990. I am also licensed to practice law in the states of Oregon, Idaho, Hawaii and Alaska. I have practiced law in the Pacific Northwest for the past twenty-three (23) years. I am a 1990 graduate of the University of Oregon School of Law.

2. I am the managing partner of the Seattle office of the law firm of Chamberlain Keaster & Brockman, LLP, which is based in Los Angeles, California.

3. I am one of the attorneys representing defendant STARR Surplus Lines Insurance Company (“STARR”) in this matter. I submit this declaration in support of Defendants Notice of Removal to Federal Court.

4. Attached as Exhibit A to Defendant’s Notice of Removal to Federal Court is a true and correct copy of the Amended Complaint filed in the Superior Court of Washington, in and for King County, case number 13-2-24407 SEA (the “state court action”).

5. Attached hereto as Exhibit B, is a true and correct copy of the Certificate of Service received from the Washington State Insurance Commissioner (the “Insurance Commissioner”) stating that it received a copy of the state court action on July 9, 2013.

6. Attached hereto as Exhibit C, is a true and correct copy of the Certificate of Service received from the Washington State Insurance Commissioner (the “Insurance Commissioner”) stating that it received a copy of the state court action on July 12, 2013.

7. Attached hereto as Exhibit D, is a true and correct copy of the corporate information printout from the Washington Secretary of State’s website for plaintiff ACME Food Sales, Inc. (“ACME), indicating that ACME filed as a Washington corporation in 1973.

8. Attached hereto as Exhibit E, is a true and correct copy of the corporate information printout from the Illinois Department of Insurance website, indicating that STARR was incorporated in Illinois in 2009, with place of business in New York.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct.

DATED this 7^h day of August, 2013, at Seattle, Washington.

By: /s/
Peter J. Mintzer

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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I further certify that on August 7, 2013 I served a copy of the foregoing document upon the following interested parties in the manner indicated below:

<i>Attorneys for Plaintiff</i> Donald B. Scaramastra Garvey Schubert Barer 1191 Second Avenue, 18th Floor Seattle, WA 98101-2939	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Overnight Courier <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email to dscar@gsblaw.com
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DATED this 7th day of August, 2013.

CHAMBERLIN KEASTER & BROCKMAN LLP

/s/
Peter J. Mintzer, WSBA No. 19995
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